

**UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:        Natacha F. Charles</b>	:	<b>Chapter 13</b>
<b>Debtor</b>	:	
<b>Lakeview Loan Servicing, LLC</b>	:	
<b>Movant</b>	:	<b>Bankruptcy Case Number</b>
	:	<b>19-15494 AMC</b>
	:	
<b>v.</b>	:	
	:	
<b>Natacha F. Charles</b>	:	
<b>Respondent/Debtor</b>	:	
	:	
<b>And</b>	:	
	:	
<b>Scott F. Waterman, Esquire</b>	:	
<b>Trustee</b>	:	

**Debtor's Response to the Motion of Lakeview Loan Servicing, LLC  
for Relief from the Automatic Stay**

Debtor, **Natacha F. Charles**, by and through her counsel, **Michael Schwartz, Esquire**, hereby files this response to the Motion for Relief of Lakeview Loan Servicing, LLC and in support thereof avers as follows:

1.     **ADMITTED.**
2.     **ADMITTED.**
3.     **ADMITTED.**
4.     **ADMITTED.**
5.     **ADMITTED.**
6.     **ADMITTED.**
7.     **ADMITTED.**
8.     **ADMITTED.**
9.     **DENIED.** Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is

demanded at time of hearing if deemed relevant. By way of further response, any payments missed were permitted by Movant who granted a forbearance of the mortgage payments, resulting from consequences related to COVID-19. Movant is permitted to resolve these payments by various means including, but not limited to, loan modification. Debtor has requested a loan modification application from Movant and intends to file said application.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, any payments missed were permitted by Movant who granted a forbearance of the mortgage payments, resulting from consequences related to COVID-19. Movant is permitted to resolve these payments by various means including, but not limited to, loan modification. Debtor has requested a loan modification application from Movant and intends to file said application.
11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
12. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
13. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

14. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, any payments missed were permitted by Movant who granted a forbearance of the mortgage payments, resulting from consequences related to COVID-19.
15. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
16. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

**WHEREFORE**, Debtor, **Natacha F. Charles**, requests this Honorable Court deny the motion of Lakeview Loan Servicing, LLC for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

/s/ Michael Schwartz  
**MICHAEL SCHWARTZ, ESQUIRE**  
Attorney for Debtor